

September 8, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)  
US Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

**Re: Notice of availability and Request for Comment on the Draft Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico**

Dear Sir or Madam:

The Colorado State Soil Conservation Board and the Colorado Association of Soil Conservation Districts represent the 77 soil conservation districts in Colorado. These districts were established under state law and have the responsibility of developing and implementing locally driven plans to protect the natural resources.

We have reviewed the Draft Plan and have the following comments:


1. The answer to addressing the nitrate problem in the Northern Gulf of Mexico is not the creation of another program. Adequate funding of the existing programs is the direction that needs to be taken. The structure including policies, standards and procedures are in place. The only thing missing is the dollars to implement the plans developed by the landowners, which have not been funded. Here in Colorado, requests for funding under the Environmental Quality Incentives Program (EQIP) have been double the amount of funds available for disbursement. Available funds for soil and water conservation projects in Colorado were \$12,801,029 in FY 93 and have been reduced to \$6,128,906 in FY 00. Many of these programs are now addressing nitrate concerns and adequate funding for cost-share assistance and technical assistance would certainly enhance the existing efforts. The current programs will continue to work as a voluntary, incentive-based plan to reduce nitrates.
2. We support the monitoring program in the Draft Plan as it is necessary for two reasons. It is impossible to cover the entire Mississippi River Watershed with adequate funding to address the nitrate problem. Monitoring will be necessary to identify the tributaries that are producing the majority of the nitrates. When that has been accomplished, additional funds can be allocated to existing programs to increase the application of Best Management Practices (BMPs) to the targeted areas. The

second need for monitoring is to gage the progress being made in nitrate reduction through the application of the BMPs to the targeted areas.

3. We do not see the need for funds to do more research. The benefits derived from the application of the BMPs have been well documented over the years. Instead of using funds for research, these dollars should be used for the development and implementation of an information/education program to spread the word of the benefits to the public from the application of the BMPs. The nitrates in the Mexico Gulf are derived from municipal and agricultural sources. The urban and rural populations must be made aware of the natural resource concern and what their role is in the reduction of nitrates.

Again we want to emphasize the importance of voluntary, incentive-based programs for more efficient nutrient use. We appreciate the opportunity to comment on the Draft Plan.

  
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President – Colorado State Soil  
Conservation Board

  
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President – Colorado Association of  
Soil Conservation Districts